

UNITED STATES OF AMERICA : CRIMINAL NO. \_\_\_\_\_

v. : DATE FILED: \_\_\_\_\_

THOMAS HEFFERON : VIOLATIONS: 18 U.S.C. § 2113(a)  
(Bank robbery - 2 counts)

**COUNT ONE**

On or about January 26, 2004, at Philadelphia, in the Eastern District of Pennsylvania, defendant

did knowingly and unlawfully take, by force and violence, and by intimidation, from employees of Citizens Bank, 6958 Torresdale Avenue, Philadelphia, Pennsylvania, property and money, that is, approximately \$1,236 in United States currency, belonging to and in the care, custody, control, management and possession of Citizens Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

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**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about February 9, 2004, at Philadelphia, in the Eastern District of Pennsylvania, defendant

THOMAS HEFFERON

did knowingly and unlawfully take, by force and violence, and by intimidation, from employees of Wachovia Bank, 6420 Frankford Avenue, Philadelphia, Pennsylvania, property and money, that is, approximately \$1,715 in United States currency, belonging to and in the care, custody, control, management and possession of Wachovia Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

A TRUE BILL:

\_\_\_\_\_  
FOREPERSON

\_\_\_\_\_  
PATRICK L. MEEHAN  
United States Attorney